

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554**

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

In the Matter of)

Administration of the)
North American Numbering Plan)

CC Docket No. 92-237
Phase One and Two

COMMENTS OF THE AD HOC TELECOMMUNICATIONS USERS COMMITTEE

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June 7, 1994

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Summary

The Ad Hoc Committee supports the Commission's tentative conclusion that future NANP administration should be handled, subject to FCC oversight, by an independent (non-LEC related) organization and include responsibility for assignment not only of NPAs, but of central office codes. All vestiges of LEC control over the NANP must be eliminated if a fair and neutral administration of number assignments among LECs and other service providers is to be achieved. In addition, and as part of a neutral administration of the numbering plan, the Commission should impose a "no fault" cost recovery policy whereby, apart from contributing equitably to the cost of NANP administration, all parties -- LECs, other service providers and users -- bear their own costs for network and switch modification and/or replacement necessary to accommodate NPA, CO and other numbering code changes. In other words, LECs should no longer be uniquely entitled to seek recovery of such costs from other providers and from end users while the latter continue to bear their own costs.

In view of the impending implementation of INPAs, scheduled for January 1, 1995, the Commission must act immediately to preserve use of the digit "1" as a nationwide toll call identifier. Proposed dialing patterns calling for elimination of "1+" dialing as a toll call indicator are not necessary to implement INPAs and will (1) require users of PBX systems to incur substantial modification or replacement expenses

in order to continue to restrict unauthorized toll access and to implement complex screening arrangements for individual toll central office codes and (2) eliminate a practical and well known way for consumers to ascertain whether a call entails a toll charge. Such dialing patterns benefit only the LECs. If permitted, not only will the consumer be less readily informed so as to be able to chose not to place the call or to limit its duration, users will not be alerted to the fact that they may select an IXC to complete the call. Thus, elimination of the use of "1+" dialing as a toll call indicator is likely to have the further negative aspect of adversely affecting competition in the provision of toll services.

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**COMMENTS OF
THE AD HOC TELECOMMUNICATIONS USERS COMMITTEE**

The Ad Hoc Telecommunications Users Committee (the "Ad Hoc Committee" or "Committee") submits these comments in response to the Notice of Proposed Rulemaking adopted herein on March 30, 1994.^{1/}

I. INTRODUCTION

The Commission initiated this proceeding in 1992 by adoption of a Notice of Inquiry to explore issues relative to the future administration of the North American Numbering Plan ("NANP").^{2/} In comments and reply comments submitted in response to the NOI,^{3/} the Ad Hoc Committee expressed the view that prompt regulatory action by the Commission was required in this area and was, in fact, long overdue. Essentially alone in identifying problems encountered under the current administration

^{1/} Administration of the North American Numbering Plan, Notice of Proposed Rulemaking, CC Docket No. 92-237, FCC 94-79 (rel. April 4, 1994) (hereafter the "NPRM")

^{2/} Administration of the North American Numbering Plan, 7 FCC Rcd 6837 (1992) (the "NOI").

^{3/} See, Ad Hoc Committee Initial Comments filed December 28, 1992, and Reply Comments filed February 24, 1993 (respectively, the "NOI Comments" and "NOI Reply Comments").

of the NANP by Bell Communications Research, Inc. ("Bellcore") and the LECs, the Ad Hoc Committee and other users urged the Commission to recognize, and to remedy during the course of the Commission's establishment of a new NANP administration in this proceeding, the existing highly fragmented and uncoordinated administration of numbering assignments.

The Committee fully supports the Commission's tentative conclusions that future NANP administration should be handled, subject to FCC oversight, by an independent (i.e., non-LEC related), non-governmental organization,^{4/} and that the new NANP administrator should not only assume those functions customarily performed by Bellcore but should also perform the additional functions associated with the assignment of CO codes generally.^{5/} This approach should be implemented as soon as possible.

More, however, needs to be done. First, apart from the issue of future funding of the NANP administration itself, a "no fault" mechanism should be implemented under the new NANP whereby costs incurred by LECs to accommodate new NPA, CO and other numbering codes are viewed no differently than costs incurred by

^{4/} NPRM at ¶ 18.

^{5/} Id. at ¶ 29. Currently, Bellcore assigns only those CO codes associated the 900 service access code and CO codes within the NPA 809 for Bermuda and the Caribbean. The responsibility for assigning CO codes in all other NPA areas resides with the dominant LEC, in most cases a Bell Operating Company. Recently, the Common Carrier Bureau decided to allow Bellcore to assign CO (NXX) codes within the 500 service access codes set aside for PCS. PCS News, May 26, 1994, p. 4.

users; i.e., all parties should bear their own costs. Second, the impending implementation of Interchangeable Numbering Plan Area ("INPA") codes and the related Bellcore plan to eliminate use of the digit "1" as a toll identifier will needlessly impose additional costs upon users and the economy in the re-programming, retro-fitting or outright replacement of PBXs if users are to be able to continue to protect against unauthorized toll usage. To address these important user problems, the Ad Hoc Committee once again urges the Commission to designate the "1+" prefix exclusively for use as a toll identifier.^{6/} Combined with enforcement by the new NANP administrator of reasonable restrictions on the use of the same NPA and CO code in close geographic proximity, designation of "1+" as a toll call identifier under the NANP will greatly simplify (and reduce costs incurred in) end user acquisition, maintenance and administration of PBX systems. Furthermore, and on an even broader scale, the "1+" toll identifier will serve to automatically alert users otherwise unaware that toll charges will be incurred on a call, a

^{6/} See, Ad Hoc Committee NOI Comments, pp. 18-28; Ex Parte Letter, dated May 6, 1993, filed jointly on behalf of the Ad Hoc Committee, California Bankers Clearing House Association, MasterCard International Incorporated, New York Clearing House Association, Securities Industry Association, Consumer Federation of America, County of Los Angeles, Information Technology Association of America, International Communications Association, New York Consumer Protection Board, and Tele-Communications Association. In these filings, the Ad Hoc Committee and other user representatives have pled with the Commission to act expeditiously to avoid the industry's planned elimination of the prefix "1" as an unambiguous toll call identifier. The Commission's decision to finally address this problem comes regrettably late -- hopefully, not too late.

beneficial result not only in terms of user awareness, but because it will tend to promote toll service competition by suggesting user choice of alternative carriers.

As the Commission correctly recognizes:

[A]dequate telephone numbers, available through a uniform numbering plan, are essential to provide efficient access to new services and technologies and to support continued economic growth. The telecommunications industry will require many additional telephone numbers to accommodate the increasing consumer demand for existing communication services such as facsimile transmission, cellular telephony, and pagers and also to meet the expected demand for new services such as personal communications systems and other new mobility services. NPRM at ¶ 2. Emphasis added.

The word "uniform" merits underscoring. It is the Ad Hoc Committee's view that the full potential of the unique and vital resource represented by provision of adequate telephone numbers cannot be realized in the current fragmented, inefficient and uncoordinated scheme of administration of the NANP.

II. THE NANP MUST BE NEUTRALLY ADMINISTERED AND ALL EXISTING LEC RESPONSIBILITIES FOR NUMBER ASSIGNMENTS MUST BE TRANSFERRED TO THE NEW NANP ADMINISTRATOR

The sine qua non of a NANP that will function effectively in an increasingly competitive environment for the provision of telecommunications services is a neutral administrator that will have no strategic competitive interests to protect in the course of administering number assignments. Bellcore, of course, has advised the Commission that it no longer wishes to administer the NANP,^{2/} and the Commission has tentatively concluded that the National Exchange Carrier

^{2/} NPRM at ¶ 6.

Association ("NECA"), because of its close identification with the LEC industry segment, could not effectively perform NANP administrative functions.^{8/} NECA's relationship with the LEC industry segment precludes its selection as NANP administrator. Similarly, the historically close relationship between the LEC industry segment and the Alliance for Telecommunications Industry Solutions ("ATIS"), formerly known as the Exchange Carrier Standards Association, eliminates ATIS from consideration. Rather, the Committee agrees with the Commission's tentative conclusion that NANP administration functions would best be performed by a single, non-governmental entity not closely identified with any particular industry segment, but subject to Commission oversight.^{9/} The Commission's oversight role should include establishing national numbering policies and goals and serving as a forum for resolving disputes.

For the same reasons the Commission has tentatively concluded that the future NANP administrator must be unaffiliated

^{8/} Id. at ¶ 15.

^{9/} Id. at ¶ 18. At paragraph 16 of the NPRM, the Commission seems to suggest that the administering entity would be "new" or might be "establish[ed]" by the Commission. The Ad Hoc Committee does not believe the Commission should preclude existing entities from being considered, or that a new entity necessarily should be created by the Commission. The important requirement, in addition to competence, is that the administrator be neutral. There may be, and likely are, numerous existing organizations that have no affiliation with any industry segment and otherwise would meet reasonable qualifying criteria established by the Commission, including willingness to undertake NANP administration subject to Commission oversight.

with LEC interests,^{10/} neutral and fair administration of the NANP requires that LECs relinquish responsibility for assignment of central office codes to the NANP administrator. Therefore, the Ad Hoc Committee fully endorses the NPRM's tentative conclusion that "the new NANP administrator should not only assume those functions customarily performed by Bellcore but should also perform the additional functions associated with the assignment of CO codes."^{11/}

The Commission's tentative conclusion appears to recognize that the existing system is fraught with opportunity for LECs to achieve competitive advantage, either by delaying or withholding CO code assignments, or by extracting one-time and recurring fees from competitors receiving number assignments, fees which the assigning LECs appear not to impute as costs to their own number-using services.^{12/} The slowly blossoming demand for central office "NXX" code assignments by LEC competitors, including cellular carriers and soon to be

^{10/} Id. at ¶¶ 15, 18.

^{11/} Id. at ¶ 29.

^{12/} See, generally, Ad Hoc NOI Comments at pp. 15-18. For example, as noted in the Ad Hoc Committee's NOI Comments, LECs typically do not impute a number charge for Centrex service, whereas they do apply such charges for DID services furnished to users of competitively provided PBXs. Ad Hoc NOI Comments at p. 13. Another example of competitive advantage achieved through LEC control of NANP resources is seen in arrangements such as the New York Telephone "tie" between its control of CO assignments and its "Circuit 9" Basic Serving Arrangement, providing for 7-digit number uniformity across multiple NPAs, as discussed in the Committee's NOI Reply Comments, at pp. 13-14.

authorized providers of personal communications services,^{13/} highlights the need to remove LECs promptly from controlling roles in assigning and obtaining compensation for these numbers.

Indeed, a truly neutral administration of the NANP implies not only that responsibility for issuing CO code assignments be transferred from LECs to an impartial NANP administrator, but that equal recognition be given to costs incurred by end users and LECs in accommodating NPA and CO code changes. When a new CO code is cut into service, it must be noted on routing tables throughout the country and, in particular, on routing tables for the LEC intraLATA network. LECs point to the costs incurred in updating and maintaining such routing tables as justification for their fees for making new CO code assignments. However, while it is true LECs incur such costs, other members of the greater North American public network incur costs whenever LECs introduce new codes or make other changes. For example, when an NPA is changed, cellular carriers are required to reprogram individual cellular mobile telephone sets. Business telecommunications managers are required to purchase software upgrades or otherwise modify or reprogram PBXs to accommodate new dialing patterns. Users of automatic dialing devices, such as point-of-sale terminals, burglar/fire alarms, and any number of other applications, are similarly required to

^{13/} The Commission recently announced the date, July 25, 1994, on which it will conduct the first auctions to award PCS licenses. Implementation of Section 309(j) of the Communications Act -Competitive Bidding, Third Report and Order, PP Docket No. 93-253, FCC 94-98 (rel. May 10, 1994).

manually and individually reprogram their equipment to function with new NPA codes and/or dialing patterns. It is not at all apparent that LECs have any greater entitlement to reimbursement for such costs than other carriers and users; yet, not only do LECs obtain reimbursement under the current system, LECs do not reimburse cellular carriers, RCCs, end users or other affected parties when they (the LECs) introduce new code assignments and dialing patterns.

It should be a central goal of this proceeding to include within the rubric of a neutral administration of the NANP a mechanism for impartial treatment of all parties' costs incurred in accommodating changes in dialing patterns and assignments of new NPA, CO and other number codes. Such a mechanism should be grounded on a "no fault" approach consistent with LEC relinquishment of number assignment responsibilities to a neutral NANP administrator. Under such a concept, costs of overseeing the administration of NANP should, as the Commission has proposed, be recovered through a variety of alternative mechanisms.^{14/} Thus, while the NANP administrator would impose fees on applicants for new CO codes to reimburse the costs of sending notices of the new code assignment to all affected parties, the costs incident to each party's switch and routing modifications would be incurred by that party without any right to reimbursement. In other words, LECs would be subject to

^{14/} NPRM at ¶¶ 34-37.

precisely the same rules, fees and other conditions as any other stakeholder.

III. THE COMMISSION SHOULD PROMPTLY DESIGNATE THE "1" PREFIX FOR USE EXCLUSIVELY AS A TOLL DESIGNATOR

Under the heading "Other Numbering Issues", the NPRM deferred consideration of numbering for personal communications services and local number portability to other proceedings, but finally recognized the concerns expressed by the Ad Hoc Committee regarding the diversity of current dialing arrangements, and invited comment on the Committee's proposal that the Commission impose a standard, nationally uniform dialing pattern that would use the digit "1" as the toll indicator.^{15/} As noted by the Commission, the Ad Hoc Committee's NOI Comments expressed concern that dialing pattern options being considered by certain state regulatory commissions and individual LECs that would eliminate use of the digit "1" as the toll indicator for home NPA calls would cause substantial customer confusion and potentially reduce competition in the long distance market.^{16/} In addition, the NPRM acknowledged the problems identified by the Committee absent preservation of the digit "1" as the toll indicator in connection with the ability of end users to effectively restrict unauthorized toll calls.^{17/}

^{15/} NPRM at ¶¶ 43-44.

^{16/} Id. at ¶ 43.

^{17/} Id.

It is essential that the Commission act upon this issue promptly. In its Ex Parte Letter filed May 6, 1993, the Ad Hoc Committee highlighted the time sensitive nature of this issue, noting that elimination of use of the digit "1" as a toll call identifier had been incorporated in Bellcore's proposed implementation of "interchangeable" NPA ("INPA") codes to be effective January 1, 1995, and, if implemented, would needlessly cost telephone customers substantial sums of money, cause a good deal of customer confusion, and potentially reduce intraLATA long distance service competition. Just last month, the Commission's Industry Analysis Division issued a "Fact Sheet" advising consumers of the imminent use in some areas of "1" as an indicator that the call is longer than seven digits (to accommodate INPAs), rather than as a toll indicator, and that "PBXs or other switches programmed to block toll calls based on the use of "1" as a toll indicator will need to be altered."^{18/}

These alterations, and the attendant confusion and expense which will be incurred by end users by the elimination of use of the digit "1" as a toll indicator, are simply unnecessary. Use of INPAs can be initiated as scheduled on January 1, 1995, without eliminating use of the "1" prefix as a toll indicator, simply by imposing restrictions on assignment of CO codes using

^{18/} News Release, mimeo no. 43219, rel. May 26, 1994, Industry Analysis Division Fact Sheet, p. 2. Under the Bellcore plan, all calls within the home NPA, whether local or toll, would be dialed on a seven-digit basis, and all calls to a different NPA, whether local or toll, would be dialed on an 11 digit (1-NPA-NXX-XXXX) basis.

the same sequence of digits associated with either the home or any adjacent NPA codes for which local rate treatment applies, and by requiring that all toll calls placed within the Home NPA be dialed on an 11-digit (1-HNPA-NXX-XXXX) basis.^{19/}

Moreover, elimination of the digit "1" as a toll identifier promises to benefit only the LECs, and has serious potential adverse implications for user choice and savings in routing intraLATA calls and, consequently, for intraLATA competition from IXC's. Until now, the "1+" convention provided a practical and well known way for consumers to ascertain whether calling a particular number would entail a toll charge. Clearly, it is to the LECs' interests if customers are no longer automatically aware that certain intraLATA calls are toll-rated because at least some customers will (a) unintentionally incur toll charges they otherwise might avoid (or minimize), and (b) fail to consider use of competing IXC services to make the call. It seems obvious that if a consumer does not know whether a given call is subject to local or toll rate treatment by the LEC, he may be unable to readily determine whether the call would be less expensive if placed using the LEC or (on a 10XXX basis) using a competing IXC service. Thus, unless the digit "1" is retained

^{19/} For example, as long as the 202, 703, and 301 codes are never used as CO codes within the Washington, DC metropolitan area, stored program control central offices can continue as they do now to readily identify local calls between these NPAs as inter-NPA calls without the need for a prefix "1". Out of area NPAs that are the same as local CO codes (such as 408, the San Jose, CA NPA and a CO code in Washington) can continue to be distinguished by the prefix "1" as a toll identifier.

as a toll identifier, users risk paying higher charges for certain calls and are less likely to present traffic to IXCs even where the IXC would be the economic choice. At the same time, as noted above, elimination of the digit "1" as a toll identifier will add administrative burdens and costs for PBX end users required to maintain their own CO code tables and reprogram or replace PBX systems presently capable of blocking toll access only through the digit "1" identifier.^{20/}

In view of the foregoing, the Ad Hoc Committee once again urges the Commission to expeditiously prescribe the digit "1" for mandatory and exclusive use as a toll identifier on a nationwide basis. The following table summarizes all possible combinations of local and toll, intra- and inter-NPA call dialing patterns under this scheme:

Local call, home NPA	7 digits	NXX-XXXX
Local call, foreign NPA	10 digits	FNPA-NXX-XXXX
Toll call, home NPA	11 digits	1-HNPA-NXX-XXXX
Toll call, foreign NPA	11 digits	1-FNPA-NXX-XXXX

where HNPA = 3-digit code for Home NPA;

^{20/} As noted by the Ad Hoc Committee in its NOI Comments, under the Bellcore proposal for future use of the "1" dialing prefix, a PBX system manager will be forced to implement a complex screening arrangement for individual toll central office codes, and to maintain and update the screening table as new codes are introduced within the local calling area, which may involve multiple NPAs. Moreover, where an organization maintains multiple PBXs serving multiple sites located in different exchanges, a separate screening process must be defined and maintained for each PBX because the local calling area for each exchange will likely be different. Many PBXs simply lack the physical capability to perform such detailed screening, either because of fundamental limitations in their processors and/or memory, or in the software that controls the logic of the switch. NOI Comments, p. 24.

FNPA = 3-digit code for Foreign NPA.

Only if this dialing convention is implemented uniformly and nationally will the broad consumer protection and end user system management concerns discussed herein be effectively addressed. While it would not seem likely that state regulatory commissions will want to prescribe mandatory dialing patterns that are likely to cause consumer confusion, increase consumer costs and limit competition, the Commission must be prepared to preempt inconsistent state regulatory agency imposed dialing patterns where necessary to achieve uniform national use of the digit "1" as a toll call identifier.

IV. THE COMMISSION SHOULD REQUIRE LECs TO CEASE SCREENING AND COMPLETING INTERSTATE INTRALATA "1+" TRAFFIC, AND INSTEAD TO DELIVER SUCH CALLS TO THE CALLER'S PRESUBSCRIBED CARRIER

As noted by the Commission in the NPRM, under current practices intraLATA toll calls, whether intrastate or interstate, are routinely completed by the LEC rather than turned over to the caller's presubscribed interLATA IXC.^{21/} This practice effectively insulates the LECs from competition in the provision of intraLATA toll service, thereby artificially inflating the rates charged for such service to end users.^{22/} The Committee fully agrees with and supports the Commission's sentiments that:

^{21/} NPRM at ¶ 55.

^{22/} As noted by the Commission, a daytime call between Silver Spring, Maryland and Manassas, Virginia, a distance of about 30 miles, handled by Bell Atlantic is more expensive than a daytime call from Silver Spring to San Francisco handled by MCI or AT&T. NPRM at ¶ 57, footnote 94.

[T]he current system may well reduce competition for this traffic and may defeat customer expectations that all of their interstate toll traffic will be carried by their presubscribed IXC. Further, such calls are sometimes carried by a LEC at tariffed rates substantially higher than would have been charged if the call had been turned over to the customer's presubscribed interLATA IXC.^{23/}

The Commission can and should remedy this problem, at least on the interstate side, by prompt adoption of a requirement that LECs cease "stripping" interstate intraLATA "1+" toll traffic and, instead, deliver these calls to the carrier preselected by the end user unless the preliminary routing numbers indicate otherwise. The mere possibility that ensuring that interstate intraLATA "1+" traffic is handled by the customer's presubscribed interLATA IXC might put the BOCs at a disadvantage in competing for this business given the restrictions on their provision of interLATA services imposed under the MFJ, alluded to by the Commission in the NPRM,^{24/} should not dissuade the Commission from proceeding. First, as noted in the NPRM, a "2-PIC" system could be adopted to avoid this problem.^{25/} Second, the geographic areas where interstate intraLATA service are provided are limited,^{26/} and any competitive disadvantage experienced by BOCs in these few areas

^{23/} Id. at ¶ 57.

^{24/} Id. at ¶ 57.

^{25/} Id. at ¶ 57, footnote 96.

^{26/} Only a few areas involving interstate LATAs would be directly affected. These include the Philadelphia LATA, which includes the entire state of Delaware, the Chicago LATA which includes northwestern Indiana.

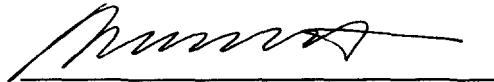
pending relief under the MFJ interLATA service restrictions is more than offset by the advantages conferred by current LEC practices of "stripping" all intraLATA calls, whether interstate or intrastate, effectively preserving near total LEC dominance in the provision of intraLATA toll services.

V. CONCLUSION

The Ad Hoc Committee urges the Commission to expeditiously conclude this important proceeding by adopting rules and policies governing a neutral administration of the North American Numbering Plan consistent with the views herein expressed. Most pressing from the perspective of users is that the Commission act quickly to establish the use of "1+" as the universal toll call identifier.

Respectfully submitted,

**AD HOC TELECOMMUNICATIONS
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June 7, 1994

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CERTIFICATE OF SERVICE

I, Sonia J. Arriola, a secretary in the law firm of Gardner, Carton & Douglas, certify that I have this 7th day of June, 1994, caused to be sent by hand, a copy of the foregoing **COMMENTS OF THE AD HOC TELECOMMUNICATIONS USERS COMMITTEE** to the following:

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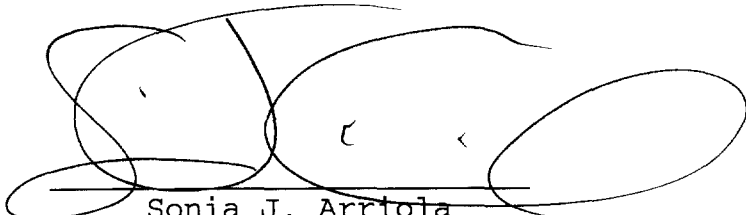
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